

 Winget | Spadafora | Schwartzberg | LLP

NEW YORK:
45 Broadway
32nd Floor
New York, NY 10006
P (212) 221-6900
F (212) 221-6989
Rieker.C@wssllp.com

March 11, 2020

Via ECF and Overnight Mail

Hon. I. Leo Glasser
Senior Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 8B South
Brooklyn, New York 11201

Re: *Salaman Oberlander et ano. v. American General Life Ins. Co., et al.*
Docket No. 20-cv-00567 (ILG)(JO)

Dear Judge Glasser:

This office represents Defendants Marc Frohlich and Frohlich Financial Group, LLC (collectively, the "Frohlich Defendants"), in the above-referenced action. We write, in accordance with Your Honor's Individual Rules, Section IV, to advise your Honor that the Defendants (the Frohlich Defendants as well as Defendant American General Life Insurance Company) each intend to file a motion to dismiss the complaint, and all counsel have conferred to set a briefing schedule for the anticipated motions.

The parties have agreed as follows:

Motions to Dismiss shall be filed on or before March 25, 2020.
Opposition papers (if any) shall be filed on or before April 27, 2020.
Reply papers (if any) shall be filed on or before May 11, 2020.

We thank your Honor for consideration of this matter.

Respectfully submitted,

/s/ *Christina M. Rieker*

Christina M. Rieker

cc: All Counsel via ECF

*S. Adelard
L. M. Spadafora
R. H. V. W. S. D. J.
3/11/20*

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